

Eric L. Cramer (*Pro Hac Vice*)
Michael Dell'Angelo (*Pro Hac Vice*)
Patrick F. Madden (*Pro Hac Vice*)
Mark R. Suter (*Pro Hac Vice*)
BERGER|MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net
pmadden@bm.net
msuter@bm.net

*Co-Lead Counsel for the Classes and
Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera, and Kyle Kingsbury*

(Additional counsel appear on signature page)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
others similarly situated,

Plaintiffs,

V.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued in this action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge under seal Plaintiffs’ Reply Statement Regarding Rule 23 Standards and Plaintiffs’ Response to Zuffa, LLC’s Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on Class Certification (ECF No. 632).

Under Section 14.3 of the Protective Order, documents designated Confidential or Highly Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the Party claiming protection shall file a motion to seal setting forth the bases for sealing and proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other applicable authority.” ECF No. 217 at 15.

Portions of Plaintiffs’ Reply Statement Regarding Rule 23 Standards and Plaintiffs’ Response to Zuffa, LLC’s Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on Class Certification (ECF No. 632) refer to materials which have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only by Defendant. Accordingly, Plaintiffs seek leave to lodge under seal Plaintiffs’ Reply Statement Regarding Rule 23 Standards and Plaintiffs’ Response to Zuffa, LLC’s Proposal Regarding the Treatment of Protected Material for the Evidentiary Hearing on Class Certification (ECF No. 632). Plaintiffs have filed these documents under seal, in accordance with the Court’s ECF system, with the instant motion. Plaintiffs have publicly filed redacted versions of these documents with the Court, and will serve un-redacted versions of these documents on Defendant, in accordance with LR IC 4-1(c)(4).

Plaintiffs do not believe that Zuffa’s confidentiality designations subject to this motion meet the compelling reasons standard. However, solely for the limited reason that the materials referenced, as they currently stand, are still designated Confidential or Highly Confidential,

1 Plaintiffs seek to file the documents in question under seal, in accordance with the Protective
2 Order. Plaintiffs continue to reserve their right to challenge Zuffa's confidentiality designations
3 pursuant to Section 6.1 of the Protective Order.

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1 Dated: January 23, 2019

Respectfully Submitted,

2 By: /s/ Eric L. Cramer
3 Eric L. Cramer

4 Eric L. Cramer (*Pro Hac Vice*)
5 Michael Dell'Angelo (*Pro Hac Vice*)
6 Patrick F. Madden (*Pro Hac Vice*)
7 Mark R. Suter (*Pro Hac Vice*)
8 BERGER|MONTAGUE PC
9 1818 Market Street, Suite 3600
10 Philadelphia, PA 19103
11 Phone: (215) 875-3000/Fax: (215) 875-4604
12 ecramer@bm.net
13 mdellangelo@bm.net
14 pmadden@bm.net
15 msuter@bm.net

16 Joseph R. Saveri (*Pro Hac Vice*)
17 Joshua P. Davis (*Pro Hac Vice*)
18 Jiamin Chen (*Pro Hac Vice*)
19 Kevin E. Rayhill (*Pro Hac Vice*)
20 JOSEPH SAVERI LAW FIRM, INC.
21 601 California Street, Suite 1000
22 San Francisco, California 94108
23 Phone: (415) 500-6800/Fax: (415) 395-9940
24 jsaveri@saverilawfirm.com
jDavis@saverilawfirm.com
jchen@saverilawfirm.com
krayhill@saverilawfirm.com

25 Benjamin D. Brown (*Pro Hac Vice*)
26 Richard A. Koffman (*Pro Hac Vice*)
27 Daniel H. Silverman (*Pro Hac Vice*)
28 COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Ave., N.W., Suite 500
Washington, DC 20005
Phone: (202) 408-4600/Fax: (202) 408 4699
bbrown@cohenmilstein.com
rkoffman@cohenmilstein.com
dsilverman@cohenmilstein.com

Co-Lead Class Counsel

1 **Liaison Counsel for the Class**

2 Don Springmeyer (Nevada Bar No. 1021)
3 Bradley S. Schrager (Nevada Bar No. 10217)
4 WOLF, RIFKIN, SHAPIRO, SCHULMAN &
5 RABKIN, LLP
6 3556 E. Russell Road, Second Floor
7 Las Vegas, Nevada 89120
8 Phone: (702) 341-5200/Fax (702) 341-5300
9 dspringmeyer@wrslawyers.com
10 bschrager@wrslawyers.com

11 **Additional Counsel for the Classes:**

12 Robert C. Maysey (*Pro Hac Vice*)
13 Jerome K. Elwell (*Pro Hac Vice*)
14 WARNER ANGLE HALLAM JACKSON & FORMANEK
15 PLC
16 2555 E. Camelback Road, Suite 800
17 Phoenix, AZ 85016
18 Phone: (602) 264-7101/Fax: (602) 234-0419
19 rmaysey@warnerangle.com
20 jelwell@warnerangle.com

21 Frederick S. Schwartz (*pro hac vice*)
22 LAW OFFICE OF FREDERICK S. SCHWARTZ
23 15303 Ventura Boulevard, #1040
24 Sherman Oaks, CA 91403
25 Phone: (818) 986-2407/Fax: (818) 995-4124
26 fred@fredschwartzlaw.com

27 William G. Caldes (admitted *pro hac vice*)
28 SPECTOR ROSEMAN KODROFF & WILLIS, P.C.
29 1818 Market Street – Suite 2500
30 Philadelphia, PA 19103
31 Phone: (215) 496-0300/Fax: (215) 496-6611
32 wcaldes@srkw-law.com

33 John D. Radice (admitted *pro hac vice*)
34 RADICE LAW FIRM, P.C.
35 34 Sunset Blvd.
36 Long Beach, NJ 08008
37 Phone: (646) 245-8502
38 jradice@radicelawfirm.com

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 23rd day of January, 2019 a true and correct copy of
3 **PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL** and supporting papers
was served via the Court's CM/ECF system on all parties or persons requiring notice.

4 _____
5 */s/ Eric L. Cramer*
Eric L. Cramer